

REMARKS

Claims 1-22 are pending. The specification and claims 1, 7, 10, 18, 20, and 21 have been amended.

The pending Action objected to the disclosure for its informal use of the reference numerals 106 and 108. Paragraphs 0016 and 0019 of the specification have been amended in ways that obviate the objection. Accordingly, it is respectfully requested that the objection to the disclosure be withdrawn.

The objection to claim 21 for lack of antecedent basis for "the surface" and for failure to acknowledge an antecedent basis for "an open ended channel" have been obviated by this Amendment, which has clarified the structure defined by claim 21 in light of the description. Accordingly, it is respectfully requested that the objection to claim 21 be withdrawn.

Claims 7, 10, 11, and 18-22 stand rejected under 35 U.S.C. § 102(b) for anticipation by U.S. Patent No. 5,343,361 to Rudy, Jr., et al. ("Rudy"). Claims 1-3, 6-10, 16, and 17 stand rejected under Section 102(e) for anticipation by U.S. Patent No. 6,747,866 to Lebo et al. ("Lebo"). Claims 4, 14, and 15 stand rejected under 35 U.S.C. § 103(a) for obviousness over a combination of Lebo and U.S. Patent No. 6,151,206 to Kato et al. ("Kato"). Claim 5 stands rejected for obviousness over a combination of Lebo and U.S. Patent No. 6,697,262 to Adams et al. ("Adams").

It is noted that the Action does not include any comments directed to claims 12 and 13. These claims would be considered as allowed but for the indication in item 6 of the Office Action Summary that all claims stand rejected.

The claims define methods and apparatus that address, among other things, a problem with crowded remote terminal (RT) cabinets for telecommunications.

Claim 7, for another example, defines a housing for supporting and mounting at least one module. The housing includes first, second, and third panel members (see, e.g., FIG. 1), a cover panel member, and at least one mounting member capable of mounting the housing to a surface. A slot is formed between the first and third panel members capable of receiving at least one module. As currently amended, claim 7 provides that the slot is capable of receiving the at least one module by moving the at

least one module into the slot in a direction toward the second panel member. Claim 18 has been similarly amended.

Rudy discloses a more or less well known "card cage" for retaining printed circuit cards that are slid into the card cage and electrically connected by suitable pads on the edges of the circuit cards. See Rudy's FIG. 2. The Action points to three walls 16, 18, and 20 of Rudy's card cage as comparable to the three panel members required by claim 7, for example, and to Rudy's rear wall 14 as comparable to the surface required by claim 7.

Simple inspection of Rudy's FIG. 2 shows that Rudy's printed circuit cards are pushed through the cage toward the rear wall 14 in a direction parallel to Rudy's wall 16, and it will be seen that this is quite different from the subject matter claimed, in which the slot is capable of receiving a module by moving the module into the slot in a direction toward the second panel member, which the Action characterizes as Rudy's wall 18.

In addition claim 7 now recites a cover panel member attached to the first, second, and third panel members such that the cover panel member covers a side of the slot. No such cover panel is disclosed in Rudy, which is not surprising because adding one would preclude insertion and connection of Rudy's circuit cards, rendering Rudy inoperable.

Moreover, Rudy does not teach the features of claims 10 and 20, which have been amended. Claim 10, for example, now provides that the at least one first orifice and the at least one second orifice are positioned opposite the second panel member. The Action points to Rudy's unnumbered holes that receive fasteners 56 for the orifices, but those holes are not positioned opposite Rudy's wall 18, which the Action characterizes as the claimed second panel member.

Because Rudy does not disclose all of the features of independent claims 7 and 18 arranged as in those claims, Rudy cannot be said to anticipate claims 7 and 18 or any of claims 8-16 and 19-22 that depend respectively thereon. For the additional reasons described above, Rudy also does not claims 10 and 20 and claims dependent thereon. Accordingly, it is respectfully requested that all anticipation rejections based on Rudy be reconsidered and withdrawn.

Turning now to the rejections based on Lebo, claim 1, for example, defines an apparatus for supporting and mounting at least one module on a surface that includes, among other things, a housing attachable to a portion of the surface and having a channel sized to receive and support at least a portion of at least one module therein. As amended, claim 1 and the other independent claims provide that the channel is covered, for example by a cover panel on a side opposite the portion of the surface.

Lebo is similar to Rudy in that Lebo also more or less describes a printed-circuit-card cage, except the "cards" in Lebo are environmentally sealed modules 170, 180, which require cooling pins 190 to dissipate internally generated heat. See Lebo, col. 3, l. 54 - col. 4, l. 11. Accordingly, Lebo's chassis 110 is open, i.e., it does not include a cover panel as required by claim 1 as amended, for example. This is not a trivial difference: if Lebo's chassis had a top panel as claimed, it would prevent heat dissipation by Lebo's pins 190. Indeed, even the side walls of Lebo's chassis 110 are partial, increasing air flow around the cooling pins 190. See FIGs. 1-3 and 10-12.

In view of the differences noted above, it should be clear that Rudy and Lebo do not teach all of the features of the pending claims, as amended, and thus Rudy and Lebo cannot anticipate any of the pending claims.

With respect to the obviousness rejections based on Lebo in combination with either Kato or Adams, neither Kato nor Adams supplies the missing features of Lebo. Kato relates to a portable device, such as a laptop computer, and discloses nothing about chassis as described by Lebo, or for that matter about card cages as described by Rudy. Adams relates to electromechanical devices for mounting electronic assemblies in racks, but like Kato discloses nothing about chassis as described by Lebo or card cages as described by Rudy.

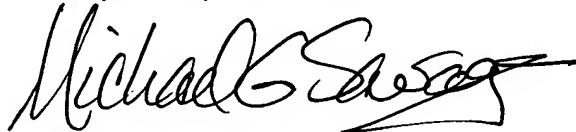
Because no combination of Lebo and either Kato or Adams discloses all of the features recited by the rejected claims, the cited documents are insufficient as bases for *prima facie* cases of obviousness. Accordingly, it is respectfully submitted that the obviousness rejections be reconsidered and withdrawn.

It is also believed that the cited documents would not have supplied any motivation to combine them as suggested by the Action and that there would have been no reasonable expectation that such complex documents could be successfully

combined to yield a working system, which even then would have had to be further modified to obtain the claimed subject matter. In view of the significant differences between the subject matters claimed and the cited combinations, it is unnecessary to discuss in detail these other requirements of a *prima facie* case of obviousness.

This application is believed to be in condition for allowance. An early Notice of same is respectfully solicited. If the Examiner has any questions, the undersigned attorney may be telephoned at the number given below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael G. Savage", with a stylized flourish at the end.

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